

### **REMARKS/ARGUMENTS**

The office action of June 26, 2006 has been carefully reviewed and these remarks are responsive thereto. Claims 7, 22, 32, 45, and 47 have been amended, and claims 59-61 have been added. No new matter has been added. Claims 7-9, 22-24, 32-51, 53, and 59-61 remain pending in this application. Reconsideration and allowance of the instant application are respectfully requested.

Preliminarily, Applicants note with appreciation the courtesies extended by Examiner Stoke to the undersigned and Mr. Brisnehan during the interview of August 31, 2006. At least some of the comments below encompass the totality of the issues discussed during the interview, and, as such, provide the substance of the interview in accord with MPEP § 713.04.

#### ***Rejections Under 35 U.S.C. § 112***

Claims 7-9, 22-24, 36, 45, and 47 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Applicants have amended claims 7 and 22 as requested by the examiner to clarify their scope, and specifically, to clarify the relationship between the vector and the history recited in those claims. Applicants have also amended claims 45 and 47 as requested by the examiner to clarify their scope. As a result of these clarifications, claims 45 and 47 no longer recite a "recent history." Accordingly, it is believed that the rejections of claims 7-9, 22-24, 45, and 47 under 35 U.S.C. § 112, second paragraph, are therefore moot.

Regarding claim 36, the office action states, "[i]t is unclear how the first and second identifiers can be assigned to the multimedia object and the modified multimedia object but is stored separately." (Office Action, pages 2-3) Applicants respectfully submit that claim 36 in its current form is not unclear or indefinite. It is well-known in the art that identifiers of objects need not be stored with the objects themselves. Pointers are a simple example of this arrangement. Applicants describe such an arrangement in greater detail on page 10, lines 14-19 of the specification as originally filed. Accordingly, Applicants request withdrawal of the rejection of claim 36 under 35 U.S.C. § 112, second paragraph.

#### ***Rejections Under 35 U.S.C. § 103***

Claims 7-9, 22-24, 32-47, 51, and 53 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 7,016,869 (*Haeberli*), in view of U.S. Patent No. 5,831,617 (*Bhukhanwala*). Applicants respectfully traverse.

Amended claim 7 recites, “a history comprising a plurality of nodes and a plurality of vectors defining relationships between the plurality of nodes.” This feature is neither taught nor suggested by the cited references.

*Bhukhanwala* relates to a container for temporally-related objects (i.e., movie icons), but does not disclose an object “history.” *Haeberli* describes a system in which a user may upload a digital image to a server, modify the appearance of the image by adding borders, text labels, cropping the image, etc., then order copies of the modified image. (*Haeberli*, Abstract) During this process, a data stack may be implemented to store the modifications made to the image, allowing a user to “Undo” and “Redo” past modifications. (*Haeberli*, Figs. 23, 24A-D; col. 23, line 1 to col. 24, line 30) The office action apparently concludes that this stack is a “history of the multimedia object” including “a node corresponding to the new unique identifier and a vector,” as recited in claim 7. (Office Action, page 4) Without acquiescing in the rejection, Applicants have amended claim 7 to recite “a history comprising a plurality of nodes and a plurality of vectors defining relationships between the plurality of nodes.” Since *Haeberli*’s “history” is merely a data stack supporting adding and removing attribute lists from the top of the stack, it does not teach or suggest “a plurality of vectors defining relationships between the plurality of nodes,” as recited in claim 7. Indeed, *Haeberli*’s disclosure does not refer at all to a “vector.” *Haeberli*’s stack has no need for vectors, nor is it even compatible with vectors that define relationships between the nodes, since each object in a stack can only be related to the objects adjacent to it.

Accordingly, *Haeberli* fails to teach or suggest “a history comprising a plurality of nodes and a plurality of vectors defining relationships between the plurality of nodes,” as recited in amended claim 7. Since *Bhukhanwala* also fails to disclose this feature, as mentioned above, Applicants submit that claim 7 is patentable over the alleged combination of *Haeberli* and *Bhukhanwala*. Claims 8 and 9 depend from claim 7, and are patentable over the cited references for at least the same reasons as claim 7, and further in view of the features recited therein.

Independent claim 22 has been amended to recite a computer-readable medium for performing steps similar to those recited in amended claim 7. Accordingly, claim 22, and dependent claims 23 and 24 are allowable for at least the same reasons as claim 7.

Independent claim 32 recites a method for synchronizing multiple versions of an object, and has been similarly amended to recite, "receiving a multimedia object having an associated unique identifier and a history comprising a plurality of nodes and a plurality of vectors defining relationships between the plurality of nodes." Accordingly, claim 32, and dependent claims 33-47, 51, and 53 are allowable for at least the same reasons as claim 7.

Claims 48 and 49, dependent from claim 32, stand rejected under 35 U.S.C. § 103(a) as being anticipated by *Haeberli* and *Bhukhanwala*, further in view of U.S. Patent No. 5,535,322 (*Hecht*). However, *Hecht* fails to overcome the deficiencies of *Haeberli* and *Bhukhanwala*, in that *Hecht* also does not teach or suggest "a history comprising a plurality of nodes and a plurality of vectors defining relationships between the plurality of nodes." Accordingly, Applicants submit that claims 48 and 49 are not obvious under 35 U.S.C. § 103(a) in view of the cited references for at least the same reasons as independent claim 32.

Claim 50, dependent from claim 32, stands rejected under 35 U.S.C. § 103(a) as being anticipated by *Haeberli* and *Bhukhanwala*, further in view of U.S. Patent No. 5,781,635 (*Chan*). However, *Chan* fails to overcome the deficiencies of *Haeberli* and *Bhukhanwala*, in that *Chan* also does not teach or suggest "a history comprising a plurality of nodes and a plurality of vectors defining relationships between the plurality of nodes." Accordingly, Applicants submit that claims 48 and 49 are not obvious under 35 U.S.C. § 103(a) in view of the cited references for at least the same reasons as independent claim 32.

#### *New Claims*

Claims 59-61 have been added based on claim 32 and reciting additional features to further distinguish the present invention over the art of record. For example, claim 59 recites, "wherein the history of the modified multimedia object is non-linear." As discussed above, *Bhukhanwala* does not disclose an object history. *Haeberli's* "history" is implemented a one-dimensional data stack that only supports adding and removing attributes from the stack, in order

to support the "Undo" and "Redo" features of *Haeberli's* image modification system. Thus, *Haeberli* does not disclose or support a "non-linear" history, as recited in claim 59.

Claim 60 recites the additional feature, "wherein the history of the modified multimedia object indicates that the object is a combination of a plurality of different multimedia objects." As discussed above, since *Haeberli's* "history" is implemented as a one-dimensional stack, every multimedia object in *Haeberli* can only be related to and derived from a single object adjacent to it on the stack. Thus, an object on *Haeberli's* stack could never be "a combination of a plurality of different multimedia objects," as recited in claim 60.

Claim 61 recites, "wherein the history of the modified multimedia object comprises a node corresponding to a second multimedia object not related to the modified multimedia object." As discussed above, in *Haeberli's*, every object in a "history" of a multimedia object must be related to every other object in the history. Thus, an object on *Haeberli's* stack could never correspond to an object "not related" to the multimedia object, as recited in claim 61.

### CONCLUSION

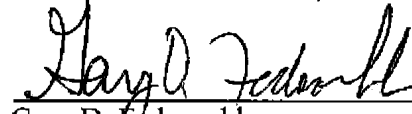
All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicits prompt notification of the same. However, if for any reason the Examiner believes the application is not in condition for allowance or there are any questions, the examiner is requested to contact the undersigned at (202) 824-3223.

Respectfully submitted,

BANNER & WITCOFF, LTD.

Dated this 26 day of September, 2006

By:



Gary D. Fedorochko  
Reg. No. 35,509

1001 G Street, N.W.  
Washington, D.C. 20001-4597  
Tel: (202) 824-3000  
Fax: (202) 824-3001